

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): John H. Gomez (SBN 171485), Allison Worden (SBN 211104), Ed Diab (SBN 262319), Kristen K. Barton (SBN 303228) GOMEZ TRIAL ATTORNEYS 655 West Broadway, #1700, San Diego, CA 92101 TELEPHONE NO.: (619) 237-3490 FAX NO.: (619) 237-3496 ATTORNEY FOR (Name): Plaintiffs Jessica Lincoln, et al.	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Diego STREET ADDRESS: 330 West Broadway MAILING ADDRESS: 330 West Broadway CITY AND ZIP CODE: San Diego, CA 92101 BRANCH NAME: Hall of Justice	
CASE NAME: Yolanda Allen, et al. v. Sharp Healthcare, a California Corporation, et al.	
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)
	CASE NUMBER: JUDGE: DEPT:

Items 1–6 below must be completed (see instructions on page 2).


1. Check **one** box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input checked="" type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (<i>not specified above</i>) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (<i>not specified above</i>) (43)
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2. This case ☒ is ☐ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|---|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input checked="" type="checkbox"/> Large number of witnesses |
| b. <input checked="" type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input checked="" type="checkbox"/> Substantial amount of documentary evidence | f. <input checked="" type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (*check all that apply*): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☒ punitive
4. Number of causes of action (*specify*): Six
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (*You may use form CM-015.*)

Date: April 4, 2019
 Kristen K. Barton

(TYPE OR PRINT NAME)


 (SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on **all** other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability (*not asbestos or toxic/environmental*) (24)
Medical Malpractice (45)
Medical Malpractice—Physicians & Surgeons
Other Professional Health Care Malpractice
Other PI/PD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (*not medical or legal*)
Other Non-PI/PD/WD Tort (35)

Employment

Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease Contract (*not unlawful detainer or wrongful eviction*)
Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (*not provisionally complex*) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ—Administrative Mandamus
Writ—Mandamus on Limited Court Case Matter
Writ—Other Limited Court Case
Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal—Labor
Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (*non-domestic relations*)
Sister State Judgment
Administrative Agency Award (*not unpaid taxes*)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

RICO (27)
Other Complaint (*not specified above*) (42)
Declaratory Relief Only
Injunctive Relief Only (*non-harassment*)
Mechanics Lien
Other Commercial Complaint Case (*non-tort/non-complex*)
Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition (*not specified above*) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition

SUMMONS (CITACION JUDICIAL)

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**

SHARP HEALTHCARE., a California Corporation; SHARP GROSSMONT HOSPITAL, and DOES 1-100 INCLUSIVE,

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

YOLANDA ALLEN; JENNIFER BAUM; RITA BAZZI; BRANDEE BONIEDOT; FARIN BRADY; [please see attachment]

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): San Diego Superior Court

HALL OF JUSTICE

330 W. BROADWAY, SAN DIEGO, CA 92101 -3827

CASE NUMBER:
(Número del Caso):

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

John H. Gomez (171485), Allison Worden (211104), Ed Diab (262319), Kristen K. Barton (303228)

DATE:
(Fecha)

Clerk, by _____, Deputy
(Secretario) (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

[SEAL]

NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):
3. ☐ on behalf of (specify):

under: <input type="checkbox"/> CCP 416.10 (corporation)	<input type="checkbox"/> CCP 416.60 (minor)
<input type="checkbox"/> CCP 416.20 (defunct corporation)	<input type="checkbox"/> CCP 416.70 (conservatee)
<input type="checkbox"/> CCP 416.40 (association or partnership)	<input type="checkbox"/> CCP 416.90 (authorized person)
<input type="checkbox"/> other (specify):	
4. ☐ by personal delivery on (date):

SHORT TITLE: Allen, et al. v. Sharp Healthcare, et al.	CASE NUMBER:
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INSTRUCTIONS FOR USE

- ➔ This form may be used as an attachment to any summons if space does not permit the listing of all parties on the summons.
- ➔ If this attachment is used, insert the following statement in the plaintiff or defendant box on the summons: "Additional Parties Attachment form is attached."

List additional parties (Check only one box. Use a separate page for each type of party.):

☒ Plaintiff
 ☐ Defendant
 ☐ Cross-Complainant
 ☐ Cross-Defendant

CASSIE BRESNAHAN; LISA BUCKLEY; SHEILA BUSH-CHILDS; PATRICIA CASTILLO; TANEE CHAPPELL; MICHELE COLPITTS; REBECCA CORONA; JENNIFER CREAGER; LAURA DELL; AMANDA DIEGO; SHARON EDELMAN; BETH FREE; TAISHA GAINES; KRISTEN GASKE; DALIA GOMEZ; LEHUA GONZALEZ; ELIZABETH GORAYEB; SARAH HALL; KAILA HODGES; KATIE HOLMES; HEIDI HOLT; JOLIE IBRAHIM; VANESSA JACOBY; MARVIE JOHANSON; CANDICE JONES; CASEY JORDAN; CHRISTINE KELLEY; MARIAH LOPEZ; MARTICELLA LUZ; TAMARA MARSHALL; TAWNY MORGAN; SHANNAH MORRISON-SPAIN; VICTORIA PAIPA; LAURA PERALES; JESSICA POPE; GABRIELA RANGEL DUPUIS; URSULA SANCHEZ; MELISSA SANTOS; ROCHELLE SCHUSTER; BECCA STEELE; JENNIFER TALMADGE; SUWSAN TOMINA; WENDIE WARD; BARBARA WOOTEN; KEONDRA YOUNG

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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

YOLANDA ALLEN; JENNIFER BAUM;
RITA BAZZI; BRANDEE BONIEDOT;
FARIN BRADY; CASSIE BRESNAHAN;
LISA BUCKLEY; SHEILA BUSH-CHILDS;
PATRICIA CASTILLO; TANEE CHAPPELL;
MICHELE COLPITTS; REBECCA CORONA;
JENNIFER CREAGER; LAURA DELL;
AMANDA DIEGO; SHARON EDELMAN;
BETH FREE; TAISHA GAINES; KRISTEN
GASKE; DALIA GOMEZ; LEHUA
GONZALEZ; ELIZABETH GORAYEB;
SARAH HALL; KAILA HODGES; KATIE
HOLMES; HEIDI HOLT; JOLIE IBRAHIM;
VANESSA JACOBY; MARVIE JOHANSON;
CANDICE JONES; CASEY JORDAN;
CHRISTINE KELLEY; MARIAH LOPEZ;
MARTICELLA LUZ; TAMARA
MARSHALL; TAWNY MORGAN;
SHANNAH MORRISON-SPAIN; VICTORIA
PAIPA; LAURA PERALES; JESSICA POPE;
GABRIELA RANGEL DUPUIS; URSULA
SANCHEZ; MELISSA SANTOS; ROCHELLE
SCHUSTER; BECCA STEELE; JENNIFER
TALMADGE; SUWSAN TOMINA; WENDIE
WARD; BARBARA WOOTEN; KEONDRA

CASE NO:

COMPLAINT FOR DAMAGES FOR:

- 1) **BREACH OF FIDUCIARY DUTY**
- 2) **INVASION OF PRIVACY –
INTRUSION INTO PRIVATE
AFFAIRS**
- 3) **INVASION OF PRIVACY (Cal.
Const., Art. 1, § 1)**
- 4) **NEGLIGENCE**
- 5) **NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS**
- 6) **UNLAWFUL RECORDING OF
CONFIDENTIAL
INFORMATION (Pen. Code
§§632, 637.2)**

DEMAND FOR JURY TRIAL

1 YOUNG)

2 Plaintiffs,)

3 vs.)

4 SHARP HEALTHCARE., a California)
Corporation; SHARP GROSSMONT)
5 HOSPITAL, and DOES 1-100 INCLUSIVE,)
6 Defendants.)

7 Plaintiffs, by and through the undersigned counsel, hereby bring this Complaint for damages
8 against Defendants, and allege the following:

9 **INTRODUCTION**

10 1. From approximately July 17, 2012 to June 30, 2013, Defendants secretly operated
11 hidden cameras in all three Labor and Delivery operating rooms at the Women's Center at Sharp
12 Grossmont Hospital. The hidden cameras were programmed to record anytime motion was detected in
13 the operating rooms. The hidden cameras recorded video images of births, including Caesarean births,
14 birth complications, dilatation and curettage to resolve miscarriages, hysterectomies, sterilizations, and
15 other medical procedures.

16 2. Sharp secretly recorded approximately 1,800 patients using these hidden cameras. In the
17 words of a Sharp executive, "the video clips capture scenes within the three operating rooms, which
18 are not open to the public. There are images contained within the multitude of images of women
19 undergoing operations of a very personal, private nature, unconscious and in states of exposure
20 depending on the operating being performed."

21 3. Sharp was grossly negligent in maintaining the recordings. The recordings were stored
22 on desktop computers that could be accessed by multiple users, some without the need for a password.
23 Sharp did not log or track who accessed the recordings, why, or when. Sharp destroyed at least half of
24 the recordings but cannot say when or how it deleted those files and cannot confirm that it took the
25 appropriate steps to ensure the files were not otherwise recoverable. Computers that stored the
26 recordings were "refreshed" or replaced, and Sharp did not ensure proper deletion of recordings on
27 those computers.

4. Sharp has acknowledged patients' rights to privacy in the recordings, under the California Constitution and California law. Sharp violated their right to privacy and breached its fiduciary duty in the most egregious way by secretly recording them, allowing non-medical personnel to view the recordings without making any effort to track who was viewing them, and then destroying some of the recordings.

JURISDICTION AND VENUE

5. The Superior Court of California for the County of San Diego has jurisdiction over this matter because the allegations and claims herein arise under California common and statutory law.

6. Venue is proper in this Court pursuant to Code of Civil Procedure § 395(a). Defendant is a corporation organized under the laws of California and maintains its principal place of business in San Diego, California. Defendant regularly conducts business throughout California, including San Diego County, and a substantial portion of the harm caused by Defendant to Plaintiffs took place in San Diego County.

PARTIES

7. Plaintiffs are women who had procedures including, but not limited to, delivery of babies, including Caesarean births, birth complications, dilatation and curettage to resolve miscarriages, hysterectomies, sterilizations, and other medical procedures during the time frame of July 17, 2012 to June 30, 2013. Plaintiffs' procedures occurred in one of three Labor and Delivery operating rooms at the Women's Center at Sharp Grossmont Hospital that contained hidden cameras placed there by the Defendants as set forth in greater detail herein.

8. Plaintiffs are informed and believe, and thereon allege, that they were secretly recorded by the aforementioned hidden cameras at Sharp Grossmont Hospital. Plaintiffs had reasonable expectations of privacy during their respective procedures and a reasonable expectation that Defendants would respect their privacy. None of the Plaintiffs consented at any time to Defendants' recording of their private moments and medical procedures, and would not have consented to any such recording.

9. Defendant Sharp HealthCare is a corporation organized under the laws of California and

1 maintains its principal place of business at 8695 Spectrum Center Boulevard, San Diego, CA 92123.

2 10. Defendant Sharp Grossmont Hospital is an affiliate of Sharp HealthCare that maintains
3 its principal place of business at 5555 Grossmont Center Drive, La Mesa, CA 91942.

4 11. Plaintiffs are unaware of the true names or capacities of the Defendants sued herein
5 under the fictitious names DOES 1-100 but pray for leave to amend and serve such fictitiously named
6 Defendants once their names and capacities become known.

7 12. Plaintiffs are informed and believe, and based thereon allege, that each and all of the
8 acts and omissions alleged herein were performed by, or are attributable to, Defendants and DOES 1-
9 100 (collectively "Defendants"), each acting as the agent for the other, with legal authority to act on
10 the other's behalf. The acts of any and all Defendants were in accordance with and represent the
11 official policies of Defendant Sharp HealthCare.

12 13. Plaintiffs are informed and believe, and based thereon allege that, at all times herein
13 mentioned, Defendants, and each of them, ratified each and every act or omission alleged herein. At all
14 times herein mentioned, Defendants, and each of them, aided and abetted the acts and omissions of
15 each and all the other Defendants in proximately causing the damages herein alleged.

16 14. Plaintiffs are informed and believe, and based thereon allege, that each of said
17 Defendants is in some manner intentionally, negligently, or otherwise responsible for the acts,
18 omissions, occurrences, and transactions alleged herein.

19 **FACTUAL ALLEGATIONS**

20 15. In July 2012, Defendants installed video cameras on the drug carts in the operating
21 rooms in the Women's Center at Sharp Grossmont Hospital. The video cameras were installed on top
22 of the drug carts and equipped with motion-detecting sensors that triggered them to begin recording
23 whenever anyone entered the room and continue recording even after motion stopped.

24 16. Defendants claim that this secret video surveillance was necessary as part of their
25 investigation into whether an employee was stealing the anesthesia drug propofol from drug carts in
26 the operating rooms. Despite that claim, Defendants' cameras were set up to record when any person
27 entered an operating room, to record a wide range of activity in the operating room beyond access to
28 the drug cart, and to continue recording even after motion stopped.

1 17. Defendants recorded approximately 1,800 surgical procedures in the operating rooms
2 between July 2012 and June 2013. These recordings show images of Defendants' female patients while
3 they were in the operating rooms. The cameras captured images of patients entering the operating
4 rooms, being moved onto surgery tables and exiting. Because of the angle and placement of the
5 cameras, patients' faces were recorded, and the patients were identifiable. These recordings also show
6 Defendants' female patients conscious and unconscious, partially robed on operating room tables,
7 undergoing medical procedures and communicating with their doctors and medical personnel.
8 Because of the nature of these procedures, the recordings captured women while they were
9 emotionally and physically exposed, and at their most vulnerable. At times, Defendants' patients had
10 their most sensitive genital areas visible.

11 18. These recordings contain matters of great sensitivity, going to the core of patients'
12 privacy rights. Defendants recorded using hidden cameras in an area of Sharp Grossmont Hospital that
13 is not open to the public. Entry into the operating room is limited to Defendants' employees and
14 doctors who need to be there to perform medical procedures.

15 19. These recordings contain images of female patients and, sometimes, newly delivered
16 babies with their doctors that Defendants allowed non-medical personnel and strangers to view and
17 have access to view. Defendants did not log or track which employees accessed the recordings.

18 20. The patients did not consent to being recorded by Defendants during their medical
19 procedures. Defendants have several policies that recognize and obligate them to respect the privacy
20 of their patients. Defendants' violations of their own policies underscore the shocking and serious
21 nature of their breach of patients' privacy. Defendants' Code of Conduct contains a "Standard of
22 Behavior" for confidentiality that states that "Sharp HealthCare protects customers' confidentiality,
23 privacy and modesty in all situations. We are sensitive to the personal nature of health care, and we do
24 everything we can to earn the trust that others place in us."

25 21. According to Defendants' list of "Patient Rights," their patients have a right to "[f]ull
26 consideration of privacy concerning their medical care program. Case discussion, examination, and
27 treatment are confidential and should be conducted discreetly. [Patients] have to right to be advised as
28 to the reason for the presence of any individual."

22. According to Defendants' list of "Patient Rights," their patients have a right to "[h]ave [their] personal privacy respected."

23. According to Defendants' list of "Patient Rights," their patients have a right to "[c]onfidential treatment of all communications and records pertaining to [their] care and stay in the hospital." Defendants promise their patients that "[w]ritten permission shall be obtained before medical records are made available to anyone not directly concerned with your care."

24. Defendants violated these rights by failing to disclose to their patients, including Plaintiffs, that a hidden camera was installed in the operating room recording their procedures, essentially inviting an unlimited number of individuals to view the private circumstances of patients' medical treatment. Defendants violated these rights further by allowing non-medical personnel, including security guards and attorneys, to view the recordings, without making any effort to log or track who viewed the recordings.

25. This action seeks damages for the Plaintiffs according to their individual proof, and not as part of a class action, for any and all harm they suffered as a result of being secretly and surreptitiously videotaped as set forth herein.

26. Plaintiffs further allege that the limitations period is tolled under principles of equitable tolling.

FIRST CAUSE OF ACTION

BREACH OF FIDUCIARY DUTY

(Against All Defendants)

27. Plaintiffs incorporate by reference and re-allege as if fully stated herein the allegations set out in the preceding paragraphs.

28. Defendants owed Plaintiffs a fiduciary duty to act with the utmost good faith in the best interests of Plaintiffs, and to act with reasonable care.

29. Defendants further owed a fiduciary duty to maintain inviolate the confidential information of Plaintiffs, including, but not limited to, confidential communications under California Evidence Code section 992.

30. Defendants had information relating to Plaintiffs that they knew or should have known was confidential.

31. Defendants used Plaintiffs' confidential information for their own benefit in conducting an internal investigation or communicated their confidential information to third parties, all in violation of California Evidence Code section 994.

32. Plaintiffs were ignorant of Defendants' conduct, did not authorize their conduct, did not give informed consent, or were acting under duress.

33. Plaintiffs' confidential information was not a matter of general knowledge.

34. Plaintiffs placed trust and confidence in Defendants.

35. Defendants were Plaintiffs' the healthcare providers.

36. Plaintiffs suffered harm, including but not limited to, suffering, anguish, fright, horror, nervousness, grief, anxiety, worry, shock, humiliation, embarrassment, shame, mortification, hurt feelings, disappointment, depression and feelings of powerlessness.

37. Defendants' conduct was a substantial factor in causing Plaintiffs' harm.

38. Defendants' conduct as alleged above was despicable; it was conduct so vile, base, or contemptible that it would be looked down on and despised by reasonable people.

39. Defendants engaged in the conduct alleged above with malice, oppression, or fraud in that Defendants' conduct was done with a willful and knowing disregard of Plaintiffs' rights, Defendants' conduct subjected Plaintiffs to cruel and unjust hardship in knowing disregard of their rights, or Defendants intentionally concealed a material fact (the secret recording devices) and did so intending to harm Plaintiffs or in reckless disregard that such harm would result.

40. As a result, in addition to other remedies available, Plaintiffs may also recover damages to punish Defendants and deter future similar wrongful conduct.

SECOND CAUSE OF ACTION

INVASION OF PRIVACY – INTRUSION INTO PRIVATE AFFAIRS

(Against All Defendants)

41. Plaintiffs incorporate by reference and re-allege as if fully stated herein the allegations set out in the preceding paragraphs.

1 42. Plaintiffs had a reasonable expectation of privacy in the operating rooms of Sharp
2 Grossmont Hospital's Women Center.

3 43. Plaintiffs also had a reasonable expectation of privacy that their communications with
4 medical personnel and their medical procedures were not being video recorded.

5 44. Plaintiffs further had a reasonable expectation that their communications with medical
6 personnel and their medical procedures were not being recorded by Sharp security personnel or by
7 anyone not physically present in the operating room at the time of said communications and
8 procedures.

9 45. Defendants intentionally intruded on Plaintiffs' privacy by installing recording devices
10 in the operating rooms.

11 46. Defendants also intentionally intruded on Plaintiffs' privacy by recording Plaintiffs'
12 confidential communications and medical procedures in the operating rooms of Sharp Grossmont
13 Hospital's Women's Center.

14 47. Defendants additionally intentionally intruded on Plaintiffs' privacy by allowing third
15 parties, including Defendants' security personnel and attorneys, to view the recordings of Plaintiffs.

16 48. Defendants further intentionally intruded on Plaintiffs' privacy by disclosing certain
17 recordings of Plaintiffs to third parties during the course of an internal investigation.

18 49. In acting as alleged above, Defendants' violated Plaintiffs' privacy rights at a time when
19 Plaintiffs were at their most vulnerable.

20 50. In acting as alleged above, Defendants' conduct was outrageous and motivated by a
21 commercial interest in disregard of Plaintiffs' privacy rights.

22 51. Defendants' intrusion into Plaintiffs' privacy would be highly offensive to a reasonable
23 person.

24 52. Plaintiffs suffered harm, including, but not limited to, suffering, anguish, fright, horror,
25 nervousness, grief, anxiety, worry, shock, humiliation, embarrassment, shame, mortification, hurt
26 feelings, disappointment, depression and feelings of powerlessness.

27 53. Defendants' conduct was a substantial factor in causing Plaintiffs' harm.

28 **THIRD CAUSE OF ACTION**

1 **INVASION OF PRIVACY – CALIFORNIA CONST., ART. 1, § 1**

2 **(Against All Defendants)**

3 54. Plaintiffs incorporate by reference and re-allege as if fully stated herein the allegations
4 set out in the preceding paragraphs.

5 55. Plaintiffs had a reasonable expectation of privacy in the operating rooms of Sharp
6 Grossmont Hospital's Women's Center.

7 56. Plaintiffs also had a reasonable expectation of privacy that their communications with
8 medical personnel and their medical procedures were not being video recorded.

9 57. Plaintiffs further had a reasonable expectation that their communications with medical
10 personnel and their medical procedures were not being viewed or heard by Sharp security personnel or
11 by anyone not physically present in the operating room at the time of said conversations,
12 communications and procedures.

13 58. Defendants intentionally intruded on Plaintiffs' privacy by installing recording devices
14 in the operating rooms.

15 59. Defendants also intentionally intruded on Plaintiffs' privacy by recording Plaintiffs'
16 confidential communications and medical procedures in the operating rooms of Sharp Grossmont
17 Hospital's Women's Center.

18 60. Defendants additionally intentionally intruded on Plaintiffs' privacy by allowing
19 Defendants' security personnel to view the recordings of Plaintiffs.

20 61. Defendants further intentionally intruded on Plaintiffs' privacy by disclosing certain
21 recordings of Plaintiffs to third parties during the course of an internal investigation.

22 62. In acting as alleged above, Defendants' violated Plaintiffs' privacy rights under Article
23 I, section 1 of the California Constitution.

24 63. In acting as alleged above, Defendants' conduct was outrageous and motivated by a
25 commercial interest in disregard of Plaintiffs' privacy rights.

26 64. Defendants' intrusion into Plaintiffs' privacy would be highly offensive to a reasonable
27 person.

65. Plaintiffs suffered harm, including, but not limited to, suffering, anguish, fright, horror, nervousness, grief, anxiety, worry, shock, humiliation, embarrassment, shame, mortification, hurt feelings, disappointment, depression and feelings of powerlessness.

66. Defendants' conduct was a substantial factor in causing Plaintiffs' harm.

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FOURTH CAUSE OF ACTION

NEGLIGENCE

(Against All Defendants)

67. Plaintiffs incorporate by reference and re-allege as if fully stated herein the allegations set out in the preceding paragraphs.

68. Defendants negligently intruded on Plaintiffs' privacy by installing recording devices in the operating rooms.

69. At all times relevant and material hereto, Defendants had a duty to exercise reasonable care in the protection of Plaintiffs' privacy in the operating rooms, where plaintiffs were at their most vulnerable.

70. Defendants breached their duty and were negligent in their actions, misrepresentations, and omissions in numerous ways including the following:

- a. Installing hidden cameras in the operating rooms at Sharp Grossmont Hospital Women's Center in a manner that captured more than just the anesthesiology carts on which they were installed;
- b. Failing to inform patients that the room they were in was being recorded;
- c. Failing to inform patients that their medical procedures, and communications with their doctors and hospital staff would be recorded;
- d. Failing to obtain consent from Plaintiffs to record Plaintiffs while they were in the operating rooms, their procedures, and their conversations with medical staff while in the operating rooms;

1 e. Failing to log or track who accessed the recordings;

2 f. Failing to use reasonable methods to ensure that any recordings that were
3 deleted were not recoverable;

4 71. Defendants recorded Plaintiffs while in the operating rooms, undressing, undergoing
5 medical procedures, and at a time when Plaintiffs were at their most vulnerable, despite the fact that the
6 Defendants knew or should have known that the unconsented recordings were a violation of Plaintiffs'
7 reasonable expectation of privacy.

8 72. As a direct and proximate consequence of Defendants' negligence, willful, wanton,
9 and/or intentional acts, omissions, misrepresentations and/or otherwise culpable acts described
10 herein, Plaintiffs sustained the injuries, damages, and harm as alleged herein.

11 73. Defendants' negligence was a substantial factor in causing Plaintiffs harm.

12 **FIFTH CAUSE OF ACTION**

13 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

14 **(Against All Defendants)**

15 74. Plaintiffs incorporate by reference and re-allege as if fully stated herein the allegations
16 set out in the preceding paragraphs.

17 75. At all times relevant and material hereto, Defendants has a duty to exercise reasonable
18 care in the protection of Plaintiffs' reasonable expectation of privacy in the operating rooms of the
19 Sharp Grossmont Hospital Women's Center.

20 76. Defendants negligently intruded on Plaintiffs' reasonable expectation of privacy by
21 installing recording devices in the operating rooms at Sharp Grossmont Hospital Women's' Center.

22 77. Defendants also negligently intruded on Plaintiffs' privacy by recording Plaintiffs'
23 confidential communications and medical procedures in the operating rooms of Sharp Grossmont
24 Hospital's Women's Center.

25 78. Defendants additionally negligently intruded on Plaintiffs' privacy by allowing
26 Defendants' security personnel to view the recordings of Plaintiffs.

27 79. Defendants further negligently intruded on Plaintiffs' privacy by disclosing certain
28 recordings of Plaintiffs to third parties during the course of an internal investigation.

80. Plaintiffs suffered serious emotional distress, including, but not limited to, suffering, anguish, fright, horror, nervousness, grief, anxiety, worry, shock, humiliation, embarrassment, shame, mortification, hurt feelings, disappointment, depression and feelings of powerlessness.

81. The emotional distress suffered by Plaintiffs is such that an ordinary, reasonable person would be unable to cope with it.

82. Defendants' conduct was a substantial factor in causing Plaintiffs' harm.

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SIXTH CAUSE OF ACTION

UNLAWFUL RECORDING OF CONFIDENTIAL INFORMATION (Pen. Code §§ 632, 637.3)

(Against All Defendants)

83. Plaintiffs incorporate by reference and re-allege as if fully stated herein the allegations set out in the preceding paragraphs.

84. Defendants intentionally video recorded and/or eavesdropped on Plaintiffs' confidential communications and medical procedures in the operating rooms of Sharp Grossmont Hospital's Women Center by using an electronic device (hidden video cameras).

85. Plaintiffs had a reasonable expectation that their medical procedures were not being video recorded.

86. Plaintiffs had a reasonable expectation that their communications with medical personnel and their medical procedures were not being viewed by Sharp security personnel or by anyone not physically present in the operating room at the time of those procedures.

87. Defendants, by acting as herein alleged, unlawfully recorded confidential information of Plaintiffs and violated Plaintiffs' privacy rights in violation of California Penal Code §§ 632 & 637.2

88. Defendants did not have the consent of all parties to said conversations and communications to record them.

89. Plaintiffs suffered harm, including but not limited to, suffering, anguish, fright, horror, nervousness, grief, anxiety, worry, shock, humiliation, embarrassment, shame, mortification, hurt feelings, disappointment, depression and feelings of powerlessness. Plaintiffs are entitled to treble damages for such harm.

90. Defendants' conduct was a substantial factor in causing Plaintiffs' harm. As a result, and in addition to other available remedies at law, pursuant to Penal Code section 637.2, Plaintiffs are entitled to recover a sum equal to the greater of treble their actual damages or statutory penalties per violation.

91. Plaintiffs, in accordance with Chapter 3 (commencing with Section 525) of Title 7 of Part 2 of the Code of Civil Procedure, also bring an action to enjoin and restrain the Defendants from any violation of this chapter by continuing to secretly video record medical procedures without the consent of all parties.

PRAYER FOR RELIEF

1. For compensatory damages for the described losses with respect to each cause of action;
2. For general damages according to proof;
3. For special damages according to proof;
4. For statutory penalties according to proof;
5. For past and future emotional distress;
6. For punitive damages with respect to each cause of action;
7. For costs of this action;
8. For statutory attorneys' fees according to proof;
9. For reasonable attorneys' fees;
10. For pre-judgment and all other interest recoverable; and
11. For such other additional and further relief as Plaintiffs may be entitled to in law or in equity.

Dated: April 4, 2019

GOMEZ TRIAL ATTORNEYS

By:

John H. Gomez, Esq.
Allison C. Worden, Esq.
Ed Diab, Esq.
Kristen K. Barton, Esq.

PATTERSON LAW GROUP

James R. Patterson, Esq.
Allison H. Goddard, Esq.

ADMIRE & ASSOCIATES

Duane A. Admire, Esq.

Attorneys for Plaintiffs

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a jury trial on all issues.

Dated: April 4, 2019

GOMEZ TRIAL ATTORNEYS

By: 

John H. Gomez, Esq.

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PATTERSON LAW GROUP

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Allison H. Goddard, Esq.

ADMIRE & ASSOCIATES

Duane A. Admire, Esq.

Attorneys for Plaintiffs

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): John H. Gomez (171485), Allison C. Worden (211104) Ed Diab (262319), Kristen K. Barton (303228) GOMEZ TRIAL ATTORNEYS 655 West Broadway, #1700, San Diego, CA 92101 TELEPHONE NO.: (619) 237-3490 FAX NO. (Optional): (619) 237-3496 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Plaintiffs Jessica Lincoln, et al.	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Diego STREET ADDRESS: 330 West Broadway MAILING ADDRESS: 330 West Broadway CITY AND ZIP CODE: San Diego, CA 92101 BRANCH NAME: Hall of Justice	
PLAINTIFF/PETITIONER: Yolanda Allen, et al. DEFENDANT/RESPONDENT: Sharp Healthcare, a California Corporation, et al.	CASE NUMBER: JUDICIAL OFFICER:
NOTICE OF RELATED CASE	DEPT.:

Identify, in chronological order according to date of filing, all cases related to the case referenced above.

1. a. Title: Escalera v. Sharp Healthcare
 b. Case number: 37-2016-000017392-CU-PO-CTL
 c. Court: ☒ same as above
 ☐ other state or federal court (name and address):
 d. Department: C-68
 e. Case type: ☐ limited civil ☒ unlimited civil ☐ probate ☐ family law ☐ other (specify):
 f. Filing date: 05/24/2016
 g. Has this case been designated or determined as "complex?" ☐ Yes ☒ No
 h. Relationship of this case to the case referenced above (check all that apply):
 ☒ involves the same parties and is based on the same or similar claims.
 ☒ arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
 ☒ involves claims against, title to, possession of, or damages to the same property.
 ☒ is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
 ☐ Additional explanation is attached in attachment 1h
 i. Status of case:
 ☐ pending
 ☒ dismissed ☐ with ☐ without prejudice
 ☐ disposed of by judgment
2. a. Title: Carla Jones, et al. v. Sharp Healthcare, a California Corporation, et al.
 b. Case number: 37-2017-00001377-CU-NP-CTL
 c. Court: ☒ same as above
 ☐ other state or federal court (name and address):
 d. Department: C-74

PLAINTIFF/PETITIONER: Yolanda Allen, et al.	CASE NUMBER:
DEFENDANT/RESPONDENT: Sharp Healthcare, a California Corporation, et al.	

2. (continued)

- e. Case type: ☐ limited civil ☒ unlimited civil ☐ probate ☐ family law ☐ other (specify):
- f. Filing date: 1/12/2017
- g. Has this case been designated or determined as "complex?" ☐ Yes ☒ No
- h. Relationship of this case to the case referenced above (check all that apply):
- ☒ involves the same parties and is based on the same or similar claims.
- ☒ arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
- ☐ involves claims against, title to, possession of, or damages to the same property.
- ☒ is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
- ☐ Additional explanation is attached in attachment 2h
- i. Status of case:
- ☒ pending
- ☐ dismissed ☐ with ☐ without prejudice
- ☐ disposed of by judgment

3. a. Title: Usher v. Sharp Healthcare

b. Case number: 37-2018-00017113-CU-PO-CTL

- c. Court: ☒ same as above
- ☐ other state or federal court (name and address):

d. Department: C-74

e. Case type: ☐ limited civil ☒ unlimited civil ☐ probate ☐ family law ☐ other (specify):

f. Filing date: 04/06/2018

g. Has this case been designated or determined as "complex?" ☐ Yes ☒ No

h. Relationship of this case to the case referenced above (check all that apply):

- ☒ involves the same parties and is based on the same or similar claims.
- ☒ arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
- ☐ involves claims against, title to, possession of, or damages to the same property.
- ☒ is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
- ☐ Additional explanation is attached in attachment 3h

i. Status of case:

- ☒ pending
- ☐ dismissed ☐ with ☐ without prejudice
- ☐ disposed of by judgment

4. ☒ Additional related cases are described in Attachment 4. Number of pages attached: 1

Date: April 4, 2019

Kristen K. Barton

(TYPE OR PRINT NAME OF PARTY OR ATTORNEY)



(SIGNATURE OF PARTY OR ATTORNEY)

SHORT TITLE: 	CASE NUMBER:
----------------------	----------------------

ATTACHMENT (Number): 4*(This Attachment may be used with any Judicial Council form.)*

4. a. Title: Lincoln v. Sharp Healthcare
 b. Case number: 37-2019-00016922-CU-MT-CTL
 c. Court: Same as above
 d. Department: C-64
 e. Case type: Mass Tort
 f. Filing date: 3/29/2019
 g. Has this case been designated or determined as "complex?": Yes
 h. Relationship of this case to the case referenced above:
 -involves the same parties and is based on the same or similar claims.
 -arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
 -is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
 i. Status of case: Pending

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 1 of 1*(Add pages as required)*

PLAINTIFF/PETITIONER: Yolanda Allen, et al.	CASE NUMBER:
DEFENDANT/RESPONDENT: Sharp Healthcare, a California Corporation, et al.	

PROOF OF SERVICE BY FIRST-CLASS MAIL

NOTICE OF RELATED CASE

(NOTE: You cannot serve the Notice of Related Case if you are a party in the action. The person who served the notice must complete this proof of service. The notice must be served on all known parties in each related action or proceeding.)

1. I am at least 18 years old and **not a party to this action**. I am a resident of or employed in the county where the mailing took place, and my residence or business address is *(specify)*:

Gomez Trial Attorneys, 655 W. Broadway, Ste 1700, San Diego, CA 92101

2. I served a copy of the *Notice of Related Case* by enclosing it in a sealed envelope with first-class postage fully prepaid and *(check one)*:

- a. ☐ deposited the sealed envelope with the United States Postal Service.
- b. ☒ placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

3. The *Notice of Related Case* was mailed:

- a. on *(date)*: March 29, 2019
- b. from *(city and state)*: San Diego, CA

4. The envelope was addressed and mailed as follows:

- a. Name of person served:

Teresa C. Chow

Street address: 11601 Wilshire Blvd Ste 1400

City: Los Angeles

State and zip code: CA 90025-0509

- c. Name of person served:

Matthew D. Pearson

Street address: 1801 California Street, Suite 4400

City: Denver

State and zip code: CO 80202-2662

- b. Name of person served:

Rouben Varozian

Street address: 16130 Ventura Blvd, Ste 570

City: Encino

State and zip code: CA 91436

- d. Name of person served:

Street address:

City:

State and zip code:


☐ Names and addresses of additional persons served are attached. *(You may use form POS-030(P).)*

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: April 4, 2019

Nicole Stoneman

(TYPE OR PRINT NAME OF DECLARANT)



(SIGNATURE OF DECLARANT)